

MEMO ENDORSED



USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 12/02/2019

JAMES E. JOHNSON
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, N.Y. 10007

HANNAH V. FADDIS
Senior Counsel
phone: (212) 356-2486
fax: (212) 356-3509
hfaddis@law.nyc.gov

November 27, 2019

VIA ECF

Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Keith Monterey v. City of New York, et al.
17-cv-04477 (VEC) (KHP)

Your Honor:

I am the attorney assigned to represent defendants in the above-referenced action. Defendants write to respectfully request an extension of time to file pre-trial materials in this matter. Plaintiff's counsel consents to this request.

On August 19, 2019 (ECF No. 71), the Court issued an Order directing the parties to submit a joint pretrial order, requests to charge, proposed voir dire questions, and motions *in limine* by December 6, 2019, with responses to motions *in limine* to be filed no later than December 20, 2019. The parties have begun preparing these joint documents. However, due to technical difficulties, as well as scheduling conflicts during the upcoming holiday season, the parties do not believe their initial filings will be completed by December 6, 2019.¹

Accordingly, the defendants are respectfully requesting on consent that the Court extend the schedule for these pre-trial filings, as follows:

- Joint pretrial order, requests to charge, proposed voir dire questions, and motions *in limine* to be submitted by December 20, 2019; and
- Responses to motions *in limine* to be filed by January 10, 2020.²

¹ The undersigned is also preparing for the trial of another matter in the Eastern District of New York, Emelda Fitzroy v. City, et al., 16-cv-477, scheduled to begin on December 9, 2019, before the Hon. Frederic Block.

² Defendants are advised that plaintiff's counsel's office will be closed from December 23 through January 3, 2020.

Defendants thank the Court for its consideration herein.

Respectfully submitted,


/s/

Hannah V. Faddis
Senior Counsel
Special Federal Litigation Division

cc:

VIA ECF

Ilyssa Fuchs, Esq.
Cohen & Fitch LLP
Attorneys for Plaintiff

Application GRANTED. The above schedule is adopted. No further extensions will be granted.

SO ORDERED.

 12/02/2019

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE